

IN THE MATTER OF:)
)
TIMOTHY JOHN ROTH) Case No. 1100183
CRD #722565)
)

TO RESPONDENT: TIMOTHY J. ROTH
2203 FLETCHER ST.
URBANA, ILLINOIS
61801

1. Respondent Timothy John Roth ("Roth") with a last known address of 2203 Fletcher Street in Urbana, Illinois, was from January 2, 2007 to February 28, 2011, an Illinois registered investment advisor representative for Comprehensive Capital

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Management, Inc., ("CCM", a Federally Covered Investment Adviser) and was from January 25, 2005 until February 28, 2011 an Illinois registered securities salesperson for Comprehensive Asset Management and Servicing, Inc ("CAMAS", an Illinois registered securities dealer).

2. Roth is also the President of Keysoft Group, Inc with a business address of 108 Hessel Blvd Champaign, Illinois 61820. Keysoft Group, Inc. a successor organization of Keysoft Consulting Group, LLC, is a software development company, consulting firm and software developer for third party administration of Internal Revenue Code Section 83 compensation plans relating to non-qualified deferred compensation plans.
3. Additionally, Roth is the Chairman and CEO of Managed Income Strategies, LLC, an Indiana registered Limited Liability Company located in Indianapolis, IN.
4. From October 7, 2008 through October 7, 2010, Roth was an Illinois licensed insurance producer with the Illinois Department of Insurance.
5. While employed with CCM and CAMAS as an investment adviser representative and securities salesperson, Roth worked from a branch office of CCM and CAMAS located at 108 Hessel Blvd, Suite 201, Champaign, Illinois, 61820.
6. According to records of the Department, this office is not reported to the Department as a branch office.
7. On or about February 28, 2011, CCM and CAMAS terminated Roth's employment after an internal review by the Qualified Custodian for CCM and/or CAMAS, triggered an inquiry into money being diverted from accounts of large institutional employers under Roth's investment management and for which he was the designated investment adviser representative and/or securities salesperson.
8. At least four of these accounts were characterized as non qualified deferred compensation plan accounts for key personnel of these institutions.
9. Roth had, during the time period of the inquiry utilized his discretion for these accounts through his position at CCM and CAMAS to divert cash and securities from those accounts into other accounts under Roth's control.
10. Through this scheme, Roth diverted at least \$4,000,000.00, from these accounts into accounts under his control.
11. Section 12.F of the Act provides, *inter alia*, that it shall be a violation of the Act for any person to engage in any transaction, practice or course of business in connection with the sale or purchase of securities which works or tends to work a fraud or deceit upon the purchaser or seller thereof.

12. Section 12.G of the Act provides, *inter alia*, that it shall be a violation of the Act for any person to obtain money or property through the sale of securities by means of any untrue statement of a material fact or any omission to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.
13. Section 12. J of the Act provides, *inter alia* that it shall be a violation of the Act for any person when acting as an investment adviser representative, by any mean or instrumentality, directly or indirectly: employ any device, scheme or artifice to defraud any client or prospective client, engage in any act, practice or course of business which operates as a fraud or deceit upon any client or prospective client, or engage in any act, practice or course of business which is fraudulent, deceptive or manipulative.
14. That by virtue of the foregoing the Respondent's registrations are subject to suspensions pursuant to Section 8.E.1(b), (g) and (m) of the Act.
15. That Section 8.E.3 of the Act provides, *inter alia*, that the Secretary of State may institute within two years after withdrawal of registration became effective and enter a revocation or suspension order as of the last date on which registration was effective.

PROHIBITION

16. That the aforementioned findings are based upon credible evidence.
17. On March 15, 2011, the Secretary of State issued a Temporary Order of Suspension and Prohibition, based upon the findings detailed above, and effectuated service of said Temporary Order of Suspension and Prohibition upon Respondent by Registered Mailing to the last known address.
18. The Temporary Order of Suspension and Prohibition advised Roth that he may request a hearing, and that Roth's failure to do so within thirty (30) days of entry of the Temporary Order of Suspension and Prohibition would constitute an admission of any facts alleged therein and shall constitute sufficient basis to make the Order permanent.
19. Roth has not requested a hearing within thirty (30) days of entry of the Temporary Order of Suspension and Prohibition and, therefore, pursuant to Section 11.F (2) of the Act, all factual allegations contained in the Order have been admitted as true by the Roth and are sufficient to make the Temporary Order of Suspension and Prohibition final.

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NOW THEREFORE IT IS HEREBY ORDERED: That pursuant to Section 11.F of the Act, Respondent Timothy J. Roth is hereby **PERMANENTLY PROHIBITED** from offering or selling securities in or from this State of Illinois and his registrations as a salesperson of securities and as an investment advisor are Revoked.

Dated: This 20th day of April, 2011.

A handwritten signature in black ink, reading "Jesse White". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

JESSE WHITE
Secretary of State
State of Illinois

Attorney for the Secretary of State:

Jason Chronopoulos
69 West Washington
Suite 1220
Chicago, Illinois
60602

STATE OF ILLINOIS
SECRETARY OF STATE
SECURITIES DEPARTMENT

IN THE MATTER OF: TINA MARIE ADAMS

FILE NO. 1100129

ORDER OF DISMISSAL

TO RESPONDENT:

Tina Marie Adams (Crd#: 2581172)
5412 W 138th St
Crestwood, IL 60445

C/O Metlife Securities Inc.
Attn: Director of Compliance
1095 Avenue of the Americas
New York, NY 10036

**TO THE HEARING
OFFICER:**

Soula J. Spyropoulos
4125 West Lunt Street
Lincolnwood, Illinois 60712


WHEREAS, at the time of the Notice of Hearing, the Illinois Department of Revenue's ("Department of Revenue") records indicated an outstanding tax assessment of a tax administered by the Department of Revenue;

WHEREAS, the Illinois Department of Revenue has released such tax assessment; and

WHEREAS, the Secretary of State, by and through his duly designated representative, has determined that the Notice of Hearing entered on March 18, 2011 may be dismissed against the Respondent.

IT IS HEREBY ORDERED: The Notice of Hearing entered on March 18, 2011 against the Respondent Tina Marie Adams in this matter is dismissed without prejudice.

Dated: This 13th day of April 2011.


JESSE WHITE
Secretary of State

Maria A. Pavone
Enforcement Attorney
Illinois Securities Department
Office of Secretary of State
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Chicago, IL 60602
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